

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

Abdi Nazemian, et al.,

Plaintiffs,

vs.

NVIDIA Corporation,

Defendant.

Master File Case No. 4:24-cv-01454-JST (SK)

**JOINT STIPULATION AND [PROPOSED]  
ORDER RE CASE SCHEDULE**

Plaintiffs Abdi Nazemian, Stewart O’Nan, Brian Keene, Andre Dubus, III, and Susan Orlean (collectively, “Plaintiffs”) and Defendant NVIDIA Corp. (“Defendant”) (together, “the Parties”) jointly stipulate and agree, subject to the Court’s approval, to the proposed schedule set forth below.

WHEREAS, on September 9, 2024, the Parties submitted a joint proposed case schedule (ECF No. 70) that the Court entered on September 11, 2024 (ECF No. 71));

WHEREAS, on June 25, 2025, the Parties submitted a joint revised case schedule (ECF No. 158) that the Court entered on June 27, 2025 (ECF No. 159);

WHEREAS, on October 14, 2025, Plaintiffs submitted a proposed amended case schedule (ECF No. 186-4) that omitted deadlines for specific events previously agreed to by the Parties;

WHEREAS, Plaintiffs’ proposed amended schedule also changed the spacing between certain deadlines previously agreed to by the Parties;

WHEREAS, the Court entered Plaintiffs’ amended case schedule on October 15, 2025 (ECF No. 188);

WHEREAS, the Parties have met and conferred, and agreed that the omitted dates previously agreed to by the Parties should be restored, and to allow additional time for the completion of privilege logs;

Pursuant to Civil Local Rule 6-1, the Parties jointly submit the following proposed amended case schedule:

<u>Event</u>	<u>Previous Date in ECF No. 159</u>	<u>Current Date in ECF No. 188</u>	<u>Proposed Date</u>
Deadline for Substantial completion of production	10/9/2025	11/24/2025	11/24/2025 (no change)
Deadline to Produce Privilege Logs	11/7/2025	12/8/2025	1/16/2026
Deadline to Serve Written Discovery, Subpoenas, Depo Notices	1/8/2026	2/9/2026	2/9/2026 (no change)
Deadline to File Motions re Fact Discovery	1/29/2026	2/26/2026	2/26/2026 (no change)
Close of Pre-Class Certification Fact	2/6/2026	3/6/2026	3/6/2026 (no

<u>Event</u>	<u>Previous Date in ECF No. 159</u>	<u>Current Date in ECF No. 188</u>	<u>Proposed Date</u>
Discovery			change)
Deadline for Service of Opening Expert Report(s) (on issues for which a party bears the burden of proof)	3/20/2026	4/17/2026	4/17/2026 (no change)
Service of Rebuttal Expert Report(s) (on issues for which a party does not bear the burden of proof)	5/1/2026	5/29/2026	5/29/2026 (no change)
Deadline for Service of Expert Reply Report(s)	6/12/2026	7/10/2026	7/10/2026 (no change)
Deadline to File Motions re Expert Discovery	6/18/2026	7/17/2026	7/17/2026 (no change)
Close of Expert Discovery	6/26/2026	7/24/2026	7/24/2026 (no change)
Deadline to File Class Certification Motions	7/31/2026	8/28/2026	8/28/2026 (no change)
Deadline to File <i>Daubert</i> Motions for Experts Opining on Class Certification Issues	7/31/2026	8/28/2026	8/28/2026 (no change)
Deadline to File Summary Judgment Motions	8/21/2026	9/18/2026	9/18/2026 (no change)
Deadline to File Any Remaining <i>Daubert</i> Motions (Non-Class Cert Experts)	8/21/2026	9/18/2026	9/18/2026 (no change)
Deadline to File Oppositions to Class Certification Motions (Six Weeks from Filing)	9/11/2026	10/9/2026	10/9/2026 (no change)
Deadline to File Oppositions to <i>Daubert</i> Motions for Experts Opining on Class Certification Issues (Six Weeks from Filing)	9/11/2026	10/9/2026	10/9/2026 (no change)
Deadline to File Oppositions to Summary Judgment Motions	10/2/2026	10/30/2026	10/30/2026 (no change)
Deadline to File Oppositions to <i>Daubert</i> Motions (Non-Class Certification Experts)	10/2/2026	Omitted	10/30/2026
Deadline to File Replies to Class Certification Motions (Six Weeks from Opposition)	10/23/2026	Omitted	11/20/2026

<u>Event</u>	<u>Previous Date in ECF No. 159</u>	<u>Current Date in ECF No. 188</u>	<u>Proposed Date</u>
Deadline to File Replies in Support of <i>Daubert</i> Motion(s) for Experts Opining on Class Certification Issues (Six Weeks from Opposition)	10/23/2026	Omitted	11/20/2026
Deadline to File Replies in Support of Summary Judgment Motions	11/6/2026	12/4/2026	12/4/2026 (no change)
Deadline to File Replies in Support of <i>Daubert</i> Motion(s) (Non-Class Certification Experts)	11/6/2026	Omitted	12/4/2026
Deadline to File Replies in Support of <i>Daubert</i>	N/A	12/4/2026	N/A (deadlines covered above)
Additional Class-Related Discovery (If Certified) Begins	If Certified, Date of Class Certification Order	If Certified, Date of Class Certification Order	
Close of Additional Class-Related Fact Discovery (If Certified)	If Certified, 120 Days from Order Granting Class Certification	If Certified, 120 Days from Order Granting Class Certification	

Dated: November 25, 2025

Respectfully Submitted,

By: /s/ Joseph R. Saveri

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Dated: November 25, 2025

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**[PROPOSED] ORDER**

Pursuant to the stipulation of the Parties, and for good cause appearing, it is hereby ORDERED that the Parties shall adhere to the following case schedule as modified:

<u>Event</u>	<u>[Proposed] Deadline</u>
Deadline for Substantial completion of production	11/24/2025
Deadline to Produce Privilege Logs	1/16/2026
Deadline to Serve Written Discovery, Subpoenas, Depo Notices	2/9/2026
Deadline to File Motions re Fact Discovery	2/26/2026
Close of Pre-Class Certification Fact Discovery	3/6/2026
Deadline for Service of Opening Expert Report(s) (on issues for which a party bears the burden of proof)	4/17/2026
Service of Rebuttal Expert Report(s) (on issues for which a party does not bear the burden of proof)	5/29/2026
Deadline for Service of Expert Reply Report(s)	7/10/2026
Deadline to File Motions re Expert Discovery	7/17/2026
Close of Expert Discovery	7/24/2026
Deadline to File Class Certification Motions	8/28/2026
Deadline to File <i>Daubert</i> Motions for Experts Opining on Class Certification Issues	8/28/2026
Deadline to File Summary Judgment Motions	9/18/2026
Deadline to File Any Remaining <i>Daubert</i> Motions (Non-Class Cert Experts)	9/18/2026
Deadline to File Oppositions to Class Certification Motions (Six Weeks from Filing)	10/9/2026
Deadline to File Oppositions to <i>Daubert</i> Motions for Experts Opining on Class Certification Issues (Six Weeks from Filing)	10/9/2026

<u>Event</u>	<u>[Proposed] Deadline</u>
Deadline to File Oppositions to Summary Judgment Motions	10/30/2026
Deadline to File Oppositions to <i>Daubert</i> Motions (Non-Class Certification Experts)	10/30/2026
Deadline to File Replies to Class Certification Motions (Six Weeks from Opposition)	11/20/2026
Deadline to File Replies in Support of <i>Daubert</i> Motion(s) for Experts Opining on Class Certification Issues (Six Weeks from Opposition)	11/20/2026
Deadline to File Replies in Support of Summary Judgment Motions	12/4/2026
Deadline to File Replies in Support of <i>Daubert</i> Motion(s) (Non-Class Certification Experts)	12/4/2026
Additional Class-Related Discovery (If Certified) Begins	If Certified, Date of Class Certification Order
Close of Additional Class-Related Fact Discovery (If Certified)	If Certified, 120 Days from Order Granting Class Certification

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Jon S. Tigar  
U.S. District Court Judge

**ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)(3)**

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the content of the filing and have authorized the filing.

Dated: November 25, 2025

By: /s/ Rachael L. McCracken

Rachael L. McCracken